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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

CECILIA L. BARNES,

CV. 05-926-AA

Plaintiff,

v.

YAHOO!, INC., a Delaware corporation,

Defendant.

**PLAINTIFF'S UNOPPOSED
MOTION TO EXTEND
DISCOVERY AND DISPOSITIVE
MOTIONS DEADLINES**

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1, this unopposed motion for an extension of time for the parties to complete discovery is submitted by Plaintiff Cecilia L. Barnes. Plaintiff certifies that her counsel Thomas R. Rask, III and Denise N. Gorrell have conferred with Defendant's counsel Samuel J. Maselli, and Mr. Maselli, consents to the filing of this motion. This motion is also supported by the Declaration of Thomas R. Rask, III.

Motion to Extend Discovery and Dispositive Motions Deadlines

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MOTION

Plaintiff moves for an extension of case management deadlines as follows: extension of the discovery deadline from February 16, 2010 to May 17, 2010, and the filing of dispositive motions from March 2, 2010 to June 1, 2010.

This case has been ongoing for approximately five years; however, no discovery took place prior to the Court's denial of Yahoo!'s Motion to Dismiss on December 8, 2009. The parties have now commenced discovery. On December 23, 2009, the parties conducted a FRCP 26f conference. On December 29, 2009, Yahoo! served Plaintiff with its first request for production. Plaintiff's response is due on January 28, 2010. On January 8, 2010, Plaintiff sent her first request for production to Yahoo!. Yahoo!'s response is due on February 10, 2010.

Both parties will need sufficient time to complete a number of depositions. Yahoo! has indicated it is likely to take approximately five depositions. Plaintiff believes she will take a similar number of depositions. Plaintiff's deposition occurred on January 15, 2010. No other depositions have occurred or are presently scheduled.

There is a substantial amount of discovery to complete and it is not feasible to do so by the current discovery deadline of February 16, 2010. Therefore, Plaintiff requests an extension in the discovery deadline to May 17, 2010, and subsequently the filing of dispositive motions to June 1, 2010.

This motion is made in good faith, not for the purpose of delay, and in the opinion of counsel, is well founded in law. This motion is based upon the attached Declaration of Thomas R. Rask, III.

DATED this 20th day of January, 2010.

s/ Thomas R. Rask, III

THOMAS R. RASK, III

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Attorneys for Cecilia L. Barnes